

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

REVERSE MORTGAGE INVESTMENT
TRUST INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11225 (MFW)

(Joint Administration Requested)

OMNIBUS NOTICE OF FIRST DAY HEARING

PLEASE TAKE NOTICE that on November 30, 2022, December 1, 2022, and December 2, 2022, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed the following motions (collectively, the “Motions”) with the United States Bankruptcy Court for the District of Delaware (the “Court”):

1. *Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases* [D.I. [10], filed November 30, 2022]
2. *Debtors' Application for Retention and Appointment of Kroll Restructuring Administration as Claims and Noticing Agent* [D.I. [18], filed November 30, 2022]
3. *Debtors' Motion for Entry of an Order (I) Extending Time to File (A) Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Waiving Requirements to File Lists of Equity Holders* [D.I. [20], filed November 30, 2022]
4. *Debtors' Motion for Entry of Interim and Final Order (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief* [D.I. [21], filed November 30, 2022]
5. *Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, Or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Determining Adequate Assurance of Payment* [D.I. [22], filed November 30, 2022]
6. *Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Prepare a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Reverse Mortgage Investment Trust Inc. (3421); Reverse Mortgage Funding LLC (0209); RMIT Cash Management LLC (6241); RMIT Operating I LLC (1844); and RMIT Operating II LLC (2301). The location of the Debtors' service address for purposes of these cases is: 1455 Broad Street, 2nd Floor, Bloomfield, NJ 07003.

Each Debtor, (II) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (III) Authorizing the Debtors to Redact Certain Personally Identifiable Information, (IV) Approving the Form and Manner of Notifying Creditors of Commencement, (V) Approving the Form and Manner of Notice to Borrowers, and (VI) Granting Related Relief [D.I. [23], filed on November 30, 2022]

7. *Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief [D.I. [25], filed November 30, 2022]*
8. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors (A) To Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [D.I. [30], filed November 30, 2022]*
9. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (a) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Maintain Their Surety Bond Program, and (E) [Enter into New Financing Agreements in the Ordinary Course of Business] and (II) Granting Related Relief [D.I. [31], filed November 30, 2022]*
10. *Debtors' Motion for Entry of Interim and Final Orders (a) Authorizing the Debtors to (I) Continue Honoring Reverse Issuer and Servicing Obligations in the Ordinary Course, and (II) Sell and Repurchase Mortgage Loans in the Ordinary Course, (B) Modifying the Automatic Stay on a Limited Basis to Facilitate the Debtors' Ongoing Obligations, and (C) Granting Related Relief of Motion and Notice of Hearing [D.I. [44], filed December 1, 2022]*
11. *Debtors' Motion for Entry of Interim and Final Orders. Pursuant to Sections 105, 361, 363, 364 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Post-Petition Financing, (II) Authorizing the Debtors' Use of Cash Collateral, (III) Granting Adequate Protection, and (IV) Granting Related Relief [D.I. 46], filed December 2, 2022]*

PLEASE TAKE FURTHER NOTICE that a hearing to consider all of the Motions listed above is scheduled for **December 5, 2022 at 10:30 a.m. (ET)** before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the relief requested in the Motions must be filed with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December**

4, 2022 at 4:00 p.m. (ET). At the same time, you must also serve a copy of the objection upon the following parties so as to be received no later than December 4, 2022 at 4:00 P.M. (ET): (a) proposed co-counsel to the Debtors, (i) Sidley Austin LLP, 787 Seventh Avenue, New York, NY 10019 (Attn: Stephen Hessler, Esq., shessler@sidley.com; Thomas R. Califano, Esq., tom.califano@sidley.com; and Anthony R. Grossi, Esq., agrossi@sidley.com); and (ii) Benesch, Friedlander, Coplan & Aronoff LLP, 1313 Market Street, Suite 1201, Wilmington, Delaware 19801 (Attn: Michael J. Barrie, Esq., mbarrie@beneschlaw.com; Jennifer R. Hoover, Esq., jhoover@beneschlaw.com; and John C. Gentile, Esq., jgentile@beneschlaw.com); (b) Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, (Attn: Timothy J. Fox, Jr., Esq.); (c) counsel to statutorily appointed committee (if any); and (d) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE that copies of the documents referenced above may be obtained free of charge from the website of the Debtors' notice and claims agent at <https://cases.ra.kroll.com/RMIT>. You may also obtain copies from the Court's website at www.deb.uscourts.gov for a fee.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTIONS WITHOUT FURTHER NOTICE OR HEARING.

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Dated: December 2, 2022
Wilmington, Delaware

Respectfully submitted,

**BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP**

/s/ Jennifer R. Hoover

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